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8 **UNITED STATES DISTRICT COURT**
9 **WESTERN DISTRICT OF WASHINGTON**
10 **AT SEATTLE**

11 STATE OF WASHINGTON; STATE OF
12 ARIZONA; STATE OF ILLINOIS; and
13 STATE OF OREGON,

14 Plaintiffs,

15 v.

16 DONALD TRUMP, in his official capacity
17 as President of the United States; U.S.
18 DEPARTMENT OF HOMELAND
19 SECURITY; BENJAMINE HUFFMAN, in
20 his official capacity as Acting Secretary of
21 Homeland Security; U.S. SOCIAL
22 SECURITY ADMINISTRATION;
23 MICHELLE KING, in her official capacity
24 as Acting Commissioner of the Social
25 Security Administration; U.S.
26 DEPARTMENT OF STATE; MARCO
RUBIO, in his official capacity as Secretary
of State; U.S. DEPARTMENT OF
HEALTH AND HUMAN SERVICES;
DOROTHY FINK, in her official capacity
as Acting Secretary of Health and Human
Services; U.S. DEPARTMENT OF
JUSTICE; JAMES MCHENRY, in his
official capacity as Acting Attorney
General; U.S. DEPARTMENT OF
AGRICULTURE; GARY WASHINGTON,
in his official capacity as Acting Secretary
of Agriculture; and the UNITED STATES
OF AMERICA,

Defendants.

NO. 2:25-cv-00127

DECLARATION OF LANE
POLOZOLA IN SUPPORT OF
PLAINTIFFS' MOTION FOR A
TEMPORARY RESTRAINING
ORDER

1 I, Lane Polozola, declare as follows:

2 1. I am over the age of 18, competent to testify as to the matters herein, and make
3 this declaration based on my personal knowledge.

4 2. I am a Managing Assistant Attorney General with the Wing Luke Civil Rights
5 Division of the Washington State Office of the Attorney General. I am one of the attorneys
6 representing Plaintiff State of Washington in the above-captioned matter.

7 3. The Plaintiff States in this matter filed this lawsuit today, January 21, 2025, and
8 file their Motion for a Temporary Restraining Order concurrently herewith. The Motion seeks a
9 Temporary Restraining Order to enjoin the President's Executive Order of January 20, 2025,
10 entitled "Protecting the Meaning and Value of American Citizenship."

11 4. Pursuant to Federal Rule of Civil Procedure 65(b) and Western District of
12 Washington LCR 65(b)(1), counsel for the State of Washington called the office of the United
13 States Attorney for the Western District of Washington in advance of filing at 9:30am on January
14 21, 2025, to notify the office of the Plaintiffs' intention to file the Complaint and Motion for a
15 Temporary Restraining Order in the near term, and to note it for same-day hearing once filed.
16 Washington's counsel spoke with Joe Fonseca with the United States Attorneys' Office, Western
17 District of Washington. Counsel for Washington also emailed the United States Attorney for the
18 Western District of Washington and the Chief of the Civil Division, at 9:32am on January 21,
19 2025, to notify the office of Plaintiff States' intention to file the Complaint and Motion for a
20 Temporary Restraining Order in the near term. The Civil Chief let the State know that Brad
21 Rosenberg with the Civil Division's Federal Programs Branch would be the State's contact for
22 the case, and the State committed to send copies of the motion for Temporary Restraining Order
23 and all supporting papers via email once filed.

24 5. Attached hereto as **Exhibit 1** is a true and correct copy of the President Trump's
25 Executive Order, signed January 20, 2025, entitled "Protecting the Meaning and Value of
26 American Citizenship."

6. Attached hereto as **Exhibit 2** is a true and correct copy of the *Agenda47: Day One Executive Order Ending Citizenship for Children of Illegals and Outlawing Birth Tourism*, DonaldJTrump.com, dated May 30, 2023. This webpage was last accessed on January 21, 2025, at <https://www.donaldjtrump.com/agenda47/agenda47-day-one-executive-order-ending-citizenship-for-children-of-illegals-and-outlawing-birth-tourism>.

7. Attached hereto as **Exhibit 3** is a true and correct copy of an article by Tarini Parti and Michelle Hackman published in The Wall Street Journal, entitled, *Trump Prepares for Legal Fight Over His 'Birthright Citizenship' Curbs* (Dec. 8, 2024). This article was last accessed on January 21, 2025, at <https://www.wsj.com/politics/policy/trump-birthright-citizenship-executive-order-battle-0900a291>.

8. Attached hereto as **Exhibit 4** is a true and correct copy of the State Department's Foreign Affairs Manual, 8FAM 301.1. This document was accessed on January 21, 2025, at <https://fam.state.gov/FAM/08FAM/08FAM030101.html>.

9. Attached hereto as **Exhibit 5** is a true and correct copy of the U.S. Department of State's Application for A U.S. Passport Form, DS-11 04-2022 copy. This document was last accessed on January 21, 2025, at https://eforms.state.gov/Forms/ds11_pdf.pdf.

10. Attached hereto as **Exhibit 6** is a true and correct copy of *I am a U.S. citizen: How do I get proof of my U.S. citizenship?*, U.S. Citizenship and Immigration Services, M-560B (October 2013) N copy. This document was last accessed on January 21, 2025, at <https://www.uscis.gov/sites/default/files/document/guides/A4en.pdf>.

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1 I declare under penalty of perjury under the laws of the State of Washington and the
2 United States of America that the foregoing is true and correct.

3 DATED and SIGNED this 20th day of January 2025, at Seattle, Washington.

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5 *s/ Lane Polozola*

LANE POLOZOLA, WSBA #50138

Assistant Attorney General
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